

LEVIN SIMES LLP
1700 Montgomery Street, Suite 250
San Francisco, California 94111
415.426.3000 phone • 415.426.3001 fax

William A. Levin (SBN 98592)
Laurel L. Simes (SBN 134637)
David M. Grimes (SBN 324292)
Samira J. Bokaie (SBN 332782)
LEVIN SIMES LLP
1700 Montgomery Street, Suite 250
San Francisco, California 94111
Telephone: (415) 426-3000
Facsimile: (415) 426-3001
Email: wlevin@levinsimes.com
Email: lsimes@levinsimes.com
Email: dgrimes@levinsimes.com
Email: sbokaie@levinsimes.com

Attorneys for Levin Simes Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF WILLIAM A. LEVIN
IN SUPPORT OF LEVIN SIMES
PLAINTIFFS' OPPOSITION TO
DEFENDANTS UBER TECHNOLOGIES,
INC., RASIER, LLC, AND RASIER-CA,
LLC'S MOTION TO DISMISS LEVIN
SIMES CASES FOR FAILURE TO
COMPLY WITH DISCOVERY ORDERS**

This Document Relates to:

*Jane Doe LS 293 v. Uber Technologies, Inc., et
al., Case No. 3:23-cv-04364-CRB*

*Jane Doe LS 231 v. Uber Technologies, Inc., et
al., Case No. 3:23-cv-04367-CRB*

*Jane Doe LS 144 v. Uber Technologies, Inc., et
al., Case No. 3:23-cv-04388-CRB*

*Jane Doe LS 112 v. Uber Technologies, Inc., et
al., Case No. 3:23-cv-05286-CRB*

*Jane Doe LS 284 v. Uber Technologies, Inc., et
al., Case No. 3:23-cv-05363-CRB*

*Jane Doe LS 126 v. Uber Technologies, Inc., et
al., Case No. 3:23-cv-05370-CRB*

*Jane Doe LS 265 v. Uber Technologies, Inc., et
al., Case No. 3:23-cv-05377-CRB*

Jane Doe LS 200 v. Uber Technologies, Inc., et

Judge: Honorable Charles R. Breyer
Date: March 28, 2025
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

LEVIN SIMES LLP
 1700 Montgomery Street, Suite 250
 San Francisco, California 94111
 415.426.3000 phone • 415.426.3001 fax

1 *al.*, Case No. 3:23-cv-05387-CRB
 2 *Jane Doe LS 66 v. Uber Technologies, Inc., et*
 3 *al.*, Case No. 3:23-cv-05414-CRB

4 *Jane Doe LS 317 v. Uber Technologies, Inc., et*
 5 *al.*, Case No. 3:23-cv-05424-CRB

6 *Jane Doe LS 234 v. Uber Technologies, Inc., et*
 7 *al.*, Case No. 3:23-cv-05433-CRB

8 *Jane Doe LS 191 v. Uber Technologies, Inc., et*
 9 *al.*, Case No. 3:23-cv-05573-CRB

10 *Jane Doe LS 273 v. Uber Technologies, Inc., et*
 11 *al.*, Case No. 3:23-cv-05946-CRB

12 *Jane Doe LS 470 v. Uber Technologies, Inc., et*
 13 *al.*, Case No. 3:24-cv-05207-CRB

14 *Jane Doe LS 232 v. Uber Technologies, Inc., et*
 15 *al.*, Case No. 3:24-cv-05327-CRB

16 *Jane Doe LS 373 v. Uber Technologies, Inc., et*
 17 *al.*, Case No. 3:24-cv-05328-CRB

18 *Jane Doe LS 462 v. Uber Technologies, Inc., et*
 19 *al.*, Case No. 3:24-cv-05329-CRB

20 *Jane Doe LS 226 v. Uber Technologies, Inc., et*
 21 *al.*, Case No. 3:24-cv-05330-CRB

22 *Jane Doe LS 166 v. Uber Technologies, Inc., et*
 23 *al.*, Case No. 3:24-cv-05331-CRB

24 *Jane Doe LS 122 v. Uber Technologies, Inc., et*
 25 *al.*, Case No. 3:24-cv-05332-CRB

26 *Jane Doe LS 202 v. Uber Technologies, Inc., et*
 27 *al.*, Case No. 3:24-cv-05333-CRB

28 *Jane Doe LS 416 v. Uber Technologies, Inc., et*
al., Case No. 3:24-cv-05335-CRB

Jane Doe LS 305 v. Uber Technologies, Inc., et
al., Case No. 3:24-cv-05338-CRB

Jane Doe LS 201 v. Uber Technologies, Inc., et
al., Case No. 3:24-cv-05354-CRB

Jane Doe LS 189 v. Uber Technologies, Inc., et
al., Case No. 3:24-cv-05379-CRB

Jane Doe LS 272 v. Uber Technologies, Inc., et
al., Case No. 3:24-cv-05390-CRB

LEVIN SIMES LLP
 1700 Montgomery Street, Suite 250
 San Francisco, California 94111
 415.426.3000 phone • 415.426.3001 fax

Jane Doe LS 199 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05402-CRB

Jane Doe LS 279 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05420-CRB

Jane Doe LS 139 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05527-CRB

Jane Doe LS 487 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05611-CRB

Jane Doe LS 141 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05634-CRB

Jane Doe LS 423 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05676-CRB

Jane Doe LS 491 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05678-CRB

Jane Doe LS 441 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05751-CRB

Jane Doe LS 518 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05761-CRB

Jane Doe LS 319 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05800-CRB

Jane Doe LS 484 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05824-CRB

John Doe LS 4 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05861-CRB

Jane Doe LS 368 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05898-CRB

Jane Doe LS 274 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05902-CRB

Jane Doe LS 359 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05908-CRB

Jane Doe LS 342 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05913-CRB

Jane Doe LS 304 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05914-CRB

Jane Doe LS 369 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05915-CRB

Jane Doe LS 269 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05922-CRB

LEVIN SIMES LLP
1700 Montgomery Street, Suite 250
San Francisco, California 94111
415.426.3000 phone • 415.426.3001 fax

Jane Doe LS 93 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05925-CRB

Jane Doe LS 7 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05926-CRB

Jane Doe LS 504 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05928-CRB

Jane Doe LS 180 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05936-CRB

Jane Doe LS 119 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-05937-CRB

Jane Doe LS 197 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-06003-CRB

Jane Doe LS 314 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-06016-CRB

Jane Doe LS 188 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-06022-CRB

Jane Doe LS 230 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-06026-CRB

Jane Doe LS 209 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-06033-CRB

Jane Doe LS 532 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-06927-CRB

Jane Doe LS 534 v. Uber Technologies, Inc., et al., Case No. 3:24-cv-07142-CRB

1 I, William A. Levin declare as follows:

2
3 1. I am an attorney who is duly licensed to practice law before all courts of the State of
4 California. I am a partner the law firm Levin Simes LLP, and counsel of record for all Jane Doe
5 LSA and Jane Doe LS Plaintiffs in MDL No. 3084. I make this declaration of my personal
6 knowledge. If called as a witness, I could and would competently testify to the matters set forth
7 herein.

8 2. This declaration is made in support of Levin Simes Plaintiffs' Opposition to Defendants
9 Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Motion to Dismiss Levin Simes
10 Cases for Failure to Comply with Discovery Orders.

11 3. Since this issue was raised in late November 2024, our firm has been able to cure fifty
12 percent of the fact sheet deficiencies, and we expect we will continue to cure them.

13 4. Our firm's efforts to reach the Plaintiff subject to Uber's motion include numerous phone
14 calls, emails, texts, written letters, and address searches. We also employed investigators to trace
15 new contact information for these individuals.

16 5. Uber identifies 57 Plaintiffs, however in the time between Uber's filing of its moving
17 papers and the filing of this brief, Levin Simes produced three additional fact sheets.

18 6. Further, two of the Plaintiffs subject to Uber's motion are currently incarcerated, and one
19 Plaintiff is deceased.

20 7. Uber brought a similar request in the JCCP before Judge Schulman. Judge Schulman
21 denied the request because the cases were stayed, and bellwethers were already selected.

22 I declare under penalty of perjury under the laws of the United States of America that the
23 foregoing is true and correct. Executed on March 4, 2025, in San Francisco, California.

24 Respectfully Submitted,

25 **LEVIN SIMES LLP**

26 /s/ William A. Levin

27 William A. Levin

28 Attorney for Plaintiff